



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

April 19, 2012

Robert Dubois
U.S. Fish and Wildlife Service
646 Cajundome Blvd., Suite 400
Lafayette, LA 70506

Subject: Draft Environmental Assessment (DEA) for South Lake Lery Shoreline and Marsh Restoration (BS-16)

Mr. Dubois:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA) and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Assessment (DEA) titled South Lake Lery Shoreline and Marsh Restoration (BS-16). The proposed action would support the objectives of the Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA) by restoring or creating ridge and marsh habitat. Restoration of these habitats will help reduce storm surge; maintain water quality; and provide healthy habitat for wildlife in the area.

EPA offers the following comments in preparation of the Final EA.

Section 1.1 – Introduction

- The westernmost borrow area in Figure 2 appears to indicate existing marsh habitat is present. Please provide clarification on whether the area is indeed existing marsh, or if Figure 2 mistakenly included the area in the borrow pit delineation.

Section 2.2.B-Alternative 2-Preferred Alternative

- This section states “five marsh creation sites will be filled with hydraulically dredged material from Lake Lery.” Figure 2 only delineates three marsh creation sites. Please provide a more detailed map and verbal description of the marsh creation sites.

Section 2.2.C-Alternative 2-Preferred Alternative

- This section details how deep the cut will be in the borrow area and how many surface acres the borrow areas encompass. Please include the current depth of the borrow area, clearly state if the borrow area is expected to fill in, and a timeframe in which filling in will occur.
- Discuss what effects sediment dredging will have on dissolved oxygen levels in Lake Lery, and if this will affect fisheries in the lake.
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Section 7-Compliance with Laws, Regulations, and Policies

- Provide the USFWS concurrence letter indicating the proposed action is not likely to adversely affect any threatened or endangered species.
- Provide the Louisiana Department of Environmental Quality's (LDEQ) water quality certification stating that the placement of fill will not violate water quality standards of Louisiana.
- Provide the Louisiana Department of Natural Resources (LDNR) coastal consistency determination demonstrating compliance with the Coastal Zone Management Act (CZMA).
- Include a section 404(b)(1) evaluation from the U.S. Army Corps of Engineers (USACE) indicating the discharge of dredged material complies with section 404(b)(1) of the Clean Water Act (CWA).
- Provide the National Marine Fisheries Service finding regarding compliance with the Magnuson-Stevens Fishery Conservation and Management Act.
- Provide the Louisiana Department of Recreation, Culture, and Tourism finding regarding compliance with the Archeological and Historic Preservation Act.

Other Comments

- Add a discussion of air emissions in the Final EA. Existing air quality, the influence dredging equipment will have to existing air quality, and any best management practices and mitigation measures to reduce air quality impacts should be discussed.
- Consolidate statements concerning cumulative impacts into one section.
- Include a section detailing any mitigation measures that will be taken to avert impacts of the preferred alternative.
- Please submit a Finding of No Significant Impact (FONSI) with the Final EA.

We appreciate the opportunity to provide comments for the DEA. Should you have any questions or concerns regarding this letter, do not hesitate to contact Keith Hayden of my staff, at 214-665-2133 or [[HYPERLINK "mailto:hayden.keith@epa.gov"](mailto:hayden.keith@epa.gov)] for assistance.

Sincerely,

Rhonda Smith
Chief, Office of Planning and
Coordination